

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

JESUS PARRA,
Plaintiff,

v.

FEDEX FREIGHT SERVICES, INC.,
a/k/a FEDEX CORPORATE SERVICES,
INC., a/k/a
FEDEX CORPORATION,
Defendant.

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CIVIL ACTION NO: 1:15-CV-00030-SS

JOINT DISCOVERY CONTROL PLAN

Pursuant to Rule 26(f) of the Federal Rules of Civil Procedure and the Order of this Court, the Plaintiff and Defendant have conferred to consider the nature and basis of their claims and defenses and the possibilities for a prompt settlement or resolution of the case, to make or arrange for the disclosures required by Rule 26(a)(1), and to develop a proposed discovery plan. The parties jointly present to the Court this written report outlining a proposed discovery control plan. The parties show the Court as follows:

1. No changes should be made in the timing, form or requirement for Initial Disclosures under Rule 26(a)(1), except that the parties have agreed to exchange Initial Disclosures on April 24, 2015.

2. Discovery may be needed on the following subjects: Plaintiff's causes of action, Defendant's affirmative defenses, Plaintiff's alleged damages. Discovery should be completed by **December 18, 2015**. Discovery need not be conducted in phases or be limited to or focused upon particular issues. The parties also agree that no changes should be made to the generally applicable discovery rules and that all discovery will be conducted pursuant to the Federal Rules of Civil Procedure and this Court's orders.

3. No changes should be made in the limitations on discovery imposed under these rules or by local rule, and no other limitations should be imposed.

4. The parties are also filing a proposed Scheduling Order on March 16, 2015. The parties do not currently see a need for any other orders under Rule 26(c) or under Rule 16(b) and (c).

Respectfully submitted,

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/s/Rachel Noffke

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this document was served on the following known Filing Users through the NEF, on this 4th day of March, 2015:

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